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 20 ***Attorneys for Defendants***

21 **THE UNITED STATES DISTRICT COURT**
 22 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

23 MELISSA GONZALEZ,
 24 individually and on behalf of all
 25 others similarly situated,

26 Plaintiffs,

27 vs.

28 WEST COAST UNDERCOVER,
 INC. dba 4PLAY THE
 GENTLEMEN’S CLUB, a
 California corporation; FRANK
 GRUNDEL, an individual; DOE
 MANAGERS 1- 3; and DOES 4-10,
 inclusive,

Defendants.

) Case No. 2:23-cv-01259-JFW-AGR

)

) **COLLECTIVE ACTION**

)

) **JOINT STIPULATION TO**
) **APPEAR AT SCHEDULING**
) **CONFERENCE VIA ZOOM**

)

) Scheduling Conference:

) Current Date: June 12, 2023

) Time: 1:15 p.m.

) Ctrm.: 7A

) Judge: Hon. John F. Walter

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JOINT STIPULATION TO APPEAR AT SCHEDULING CONFERENCE VIA ZOOM

1 Plaintiffs Melissa Gonzalez and Andrea Kepler (“Plaintiffs”) and
 2 defendants West Coast Undercover, Inc. dba 4PLAY The Gentlemen’s Club
 3 (“4Play”) and Frank Grundel (collectively “Defendants”), by and through their
 4 respective attorneys of record, hereby stipulate as follows:

5 WHEREAS, on May 2, 2023, this Court ordered a Scheduling Conference
 6 to occur on June 12, 2023, at 1:15 p.m. in Courtroom 7A on 350 W. 1st Street,
 7 Los Angeles, California 90012;

8 WHEREAS, the Plaintiffs and Defendants (collectively, the “Parties”) are
 9 required to file a Joint Report by May 26, 2023;

10 WHEREAS, Lead Counsel for Plaintiffs, John P. Kristensen has vehicle
 11 inspections in product liability cases taking place in Massachusetts on June 13,
 12 2023 and in Washington, D.C. on June 14, 2023, and will be in Massachusetts on
 13 June 12, 2023;

14 WHEREAS, Lead Counsel for Defendants, Douglas Roy, is scheduled to
 15 participate in a presentation to be held in San Francisco on June 12, 2023;

16 WHEREAS, the following Monday is June 19, 2023, a Federal Holiday;
 17 WHEREAS, Lead Counsel for Defendants, Douglas Roy, is out of the country
 18 and unavailable from June 21, 2023, through July 3, 2023;

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1 WHEREAS, the Parties stipulate as follows:

2 That Lead Counsel be permitted to appear at the Scheduling Conference via
3 Zoom, or, alternatively, that Lead Counsel's associates, Justice D. Turner for
4 Plaintiffs and Lilian Loh for Defendants, can appear in person in their place.

5 The Parties will have their Joint 26 Report filed timely by May 26, 2023.

6
7 Dated: May 24, 2023

CARPENTER & ZUCKERMAN

8
9 /s/ John P. Kristensen

10 John P. Kristensen

Justice D. Turner

Attorneys for Plaintiff

11
12 Dated: May 24, 2023

CYPRESS LLP

13
14 /s/ Douglas P. Roy

15 Douglas P. Roy

Lilian M. Loh

Attorneys for Defendants

LOCAL RULE 5-4.3.4(a)(2)(i) CERTIFICATION

The undersigned attests that all other signatories listed above on whose behalf this filing is submitted concur in the filing's content and have authorized the filing.

/s/ John P. Kristensen

John P. Kristensen

CERTIFICATE OF SERVICE

I certify that on Wednesday, May 24, 2023 a true and correct copy of the attached **JOINT STIPULATION TO APPEAR AT SCHEDULING CONFERENCE VIA ZOOM** was served via CM/ECF upon the following parties pursuant to Rule 5 of the Federal Rules of Civil Procedure:

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Lilian Loh
Garrett Harris
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Counsel for Defendants

/s/ John P. Kristensen

John P. Kristensen